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UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**  
 :  
 v. : Honorable Michael A. Hammer  
 :  
 ROBERT WOLTER : Mag. No. 19-4106  
 :

I, Michael R. Lovett, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**



Michael R. Lovett  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,  
February 7, 2019, Essex County, New Jersey

Honorable Michael A. Hammer  
United States Magistrate Judge

  
Signature of Judicial Officer

**ATTACHMENT A**

**COUNT ONE**

(Bulk Cash Smuggling Out of the United States)

On or about February 5, 2019, in Essex County, in the District of New Jersey and elsewhere, the defendant,

**ROBERT WOLTER,**

did with intent to evade a currency reporting requirement under Title 31, United States Code, Section 5316, did knowingly conceal more than \$10,000 in currency on his person, and transport and transfer, and attempt to transport and transfer such currency from a place within the United States to a place outside the United States.

In violation of Title 31, United States Code, Section 5332.

**ATTACHMENT B**

I, Michael R. Lovett, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged.

1. On February 5, 2019, at approximately 8:50 p.m. at Newark Liberty International Airport, members of the Department of Homeland Security, U.S. Customs and Border Protection ("CBP"), were conducting routine outbound examinations for Ethiopian Airlines, Flight Number 509, which was scheduled to leave Newark, New Jersey, for Lome, Togo.

2. A CBP officer stopped passenger ROBERT WOLTER ("WOLTER") to conduct an outbound currency examination. WOLTER verbally and in writing on the CBP Form 503 declared that he was traveling with \$6,000 in U.S. currency. WOLTER was then asked to present his currency for examination.

3. Upon examination, WOLTER was found to be in possession of \$10,595 in U.S. currency.